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## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BNP PARIBAS MORTGAGE CORPORATION and BNP PARIBAS,

Plaintiffs,

-against
BANK OF AMERICA, N.A.,

Defendant.

DEUTSCHE BANK AG,

Plaintiffs,

-against
Civil Action No. 09-CV-9784-RWS

Defendant.

[PROPOSED] ORDER FOR THE PRODUCTION OF DOCUMENTS

Upon consideration of Bank of America, N.A. ("BoA")'s Motion to Compel Production of Documents in Response to Bank of America's Subpoena for Documents to Freddie Mac (D.I.# 137):

## IT IS HEREBY ORDERED that:

BANK OF AMERICA, N.A.,

Freddie Mac shall produce the following two categories of documents:

- (1) Internal, non-privileged Freddie Mac documents reflecting communications among Freddie Mac and BNP Paribas and/or Deutsche Bank, AG, concerning Ocala Funding, LLC ("Ocala") from January 1, 2005 to August 4, 2009; and
- (2) Internal, non-privileged Freddie Mac documents concerning any audits, due diligence or investigation by Freddie Mac of Ocala from January 1, 2005 to August 4, 2009.

After reviewing these documents, if BoA determines that an additional production of documents by Freddie Mac is warranted, BoA may write the Court to set a hearing to address such matters. Before writing the Court regarding such a hearing, BoA and Freddie Mac shall meet and confer concerning any additional production BoA believes is warranted.

Dated:

New York, New York

United States District Judge